

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

LEROY WILLIAMS,)
)
Plaintiff,)
v.)
STATE OF ALABAMA DEPARTMENT) CASE NO. 2:06-cv-658-ID
OF TRANSPORTATION, JOE MCINNES,)
etc.)
Defendants.)

DEFENDANTS' EXHIBIT LIST

COME NOW Defendants, the State of Alabama Department of Transportation and Joe McInnes, and submit the following list of exhibits Defendants expect to introduce into evidence at the trial in this matter:

DEFENDANTS' EXHIBIT:

- A. Form 11-Seasonal Laborer dated 10/8/92
- B. Application for Examination-Highway Maintenance Technician I
- C. Certificate of Eligibles
- D. Application for Examination-Highway Maintenance Technician II
- E. Form 4-Provisional Appointment-Engineering Assistant I
- F. Employee Performance Appraisal dated 2/14/97
- G. Employee Performance Appraisal dated 2/13/98
- H. Position Classification Questionnaire dated 11/26/01
- I. Complaint Form dated April 1997
- J. Employee Performance Appraisal dated 2/19/02
- K. Complaint From dated 10/5/00

- L.** Letter dated 1/23/03 withdrawing Grievance No.736
- M.** Attendance/Punctuality Guidelines dated 2/22/05
- N.** Letter dated 5/12/05-appointment to Transportation Technologist.
- O.** Leroy Williams resume
- P.** Position Classification Questionnaire dated 5/25/05
- Q.** Reprimand for Repeated Tardiness dated 7/26/05
- R.** Counseling Session Memorandum dated 7/28/05
- S.** Driving Time confirmation Memorandum dated 8/4/05
- T.** Reprimand for Insubordination dated 8/11/05
- U.** Recommendation for Discipline dated 8/15/05
- V.** Memorandum to Don T. Arkle dated 8/19/05
- W.** Memorandum to Ron Green dated 8/22/05
- X.** Letter to Williams dated 9/1/50 termination probation
- Y.** E.E.O.C. Charge of Discrimination
- Z.** Complaint Form
- AA.** State Personnel Announcement-Transportation Technologist
- BB.** Computer printouts of Training for employees
- CC.** MapQuest printout
- DD.** Employee Performance Appraisal for 3/1/2004 through 3/1/2005
- EE.** Form 40, dated 9/8/2005
- FF.** Form 11, dated 9/27/2005
- GG.** LEICA Raw Data .rw file
- HH.** 2005 Calendar

II. Design Bureau organizational charts

JJ. Transcript of deposition of Leroy Williams

KK. Tommy Lewis' journal

RESPECTFULLY SUBMITTED
TROY KING
ATTORNEY GENERAL

s/ Andrew W. Redd
Jim R. Ippolito, Jr. (IPP001)
Assistant Attorney General
Chief Counsel

Andrew W. Redd (RED001)
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CERTIFICATE OF SERVICE

I hereby certify that, on June 18, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECT system, which will send notification to the following:

Mr. Russell W. Adams, Esq.
Wiggins, Childs, Quinn & Pantazis, L.L.C.
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s/ Andrew W. Redd
Andrew W. Redd (RED001)
Assistant Attorney General
Assistant Counsel

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